

EXHIBIT A



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Email: jj santarone@mdwecg.com

August 27, 2024

VIA EMAIL - ayatvin@wgpllp.com

Alan L. Yatvin, Esquire
Weir Greenblatt Pierce, LLP
1339 Chestnut Street
Suite 500
Philadelphia, PA 19107

VIA EMAIL - shubin@shubinlaw.com

Andrew J. Shubin, Esquire
Law Office of Andrew J. Shubin
333 South Allen Street
State College, PA 16801

RE: Calderaio, John v. Central Bucks School District
Docket No.: USDC Eastern District No.: 2:23-cv-4218
Our File No.: 19024.00950

Dear Counsel:

I ask you to contact me regarding whether or not we expect to receive responses to our discovery requests which were sent on July 8, 2024. We need to move this matter along and I need the answers to discovery along with scheduling the deposition of your client. Are you available the week of September 16th?

In the meantime, I am preparing a report for the carrier and one of the questions is: What is the demand? If you have a figure, please let me know so that I can include it in my report.

Very truly yours,

A handwritten signature in black ink, appearing to read 'JJ Santarone', written over a light blue horizontal line.

Joseph J. Santarone

JJS/jh

cc: Ashley Toth, Esquire

Toth, Ashley L.

From: Yatvin, Alan <ayatvin@wgpllp.com>
Sent: Thursday, August 29, 2024 12:54 PM
To: Santarone, Joseph J.
Cc: Andrew Shubin; Cohen, Noah S; Toth, Ashley L.; Pogolowitz, Rachel
Subject: RE: Calderaio, John v. Central Bucks School District

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Joe-

I am out of the country until the 21st. I believe the answers to interrogatories are just awaiting finalization. I don't know the status of production and Noah is on vacation until after Labor Day.

As for the week of the 16th, I am still away and Noah goes on paternity leave September 12th for 6 weeks. I believe Andrew is also unavailable that week. Plus, if you want to do in person, we will need to arrange John's travel from Florida.

We will get back to you next week when Noah and Andrew are back in the office regarding outstanding discovery, dep scheduling and a demand.

Thanks and have a good holiday weekend.

Alan

Alan L. Yatvin
Attorney at law

[PLEASE NOTE NEW FIRM NAME AND EMAIL ADDRESS](#)

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From: Edwards, Carlene <CXEdwards@mdwgcg.com>
Sent: Thursday, August 29, 2024 12:18 PM
To: Yatvin, Alan <ayatvin@wgpllp.com>; Andrew Shubin <shubin@shubinlaw.com>
Subject: [EXTERNAL] Calderaio, John v. Central Bucks School District

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Attached is correspondence from Joseph Santarone, Esquire with regard to the above matter.



Carlene Edwards

Administrative Assistant

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